

**THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Nichole Cunningham	:	
Michael J. Perrins	:	
	:	CHAPTER 7
Debtors	:	
	:	NO. 17-01048 JJT
	:	
Quicken Loans Inc.	:	
	:	
Movant	:	
v.	:	
Nichole Cunningham	:	11 U.S.C. Section 362
Michael J. Perrins	:	
	:	
Debtors	:	
Robert P. Sheils, Jr., Esq	:	
Trustee	:	

ANSWER TO MOTION FOR RELIEF OF QUICKEN LOANS INC.

NOW COMES Trustee, Robert P. Sheils, Jr., Esquire, by and through his attorneys, Sheils Law Associates, P.C., and answers the Motion of Quicken Loans Inc. for Automatic Stay, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph four and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors currently scheduled for April 28, 2017.
5. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph five and

strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

6. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph six and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

7. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph seven and strict proof thereof is demanded.

8. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eight and strict proof thereof is demanded.

9. Admitted.

10. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph ten and strict proof thereof is demanded.

11. Admitted.

12. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph twelve and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

13. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph thirteen and

strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

14. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph fourteen and strict proof thereof is demanded.

15. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph fifteen and strict proof thereof is demanded.

WHEREFORE, Robert P. Sheils, Jr., Esquire, Chapter 7 Trustee, respectfully requests this Honorable Court deny Movant's Motion for Relief until after the 341 meeting of creditors currently scheduled for April 28, 2017.

Dated: April 11, 2017

/s/ Jill M. Spott
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